

1 THE HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 FEDERAL TRADE COMMISSION, et al.,
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11 Plaintiffs,
12 v.
13 AMAZON.COM, INC., a corporation,
14 Defendant.

Case No. 2:23-cv-01495-JHC

**DECLARATION OF KATHERINE A.
TREFZ IN SUPPORT OF AMAZON'S
MOTION TO SEAL PLAINTIFFS'
MOTION TO COMPEL BRIEFING
AND EXHIBITS**

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16 I, Katherine A. Trefz, declare as follows:
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18 1. I am a partner at Williams & Connolly LLP, counsel to Defendant
19 Amazon.com, Inc. ("Amazon") in the above-captioned action. I am over eighteen years of age
20 and am competent to testify herein. I make the following statements based on my personal
knowledge.

21 2. I make this declaration in support of Amazon's Motion to Seal (Dkt. No. 376)
22 and Reply (filed concurrently with this declaration).

23 3. In correspondence dated August 2, 2024 and September 6, 2024, and during
24 conferrals on July 18, 2024 and October 11, 2024, Plaintiffs indicated that they needed the
25 information redacted in Exhibit C in order to evaluate Amazon's custodial proposal and
26 propose their own. They indicated they did not have access to this information.

DECLARATION OF KATHERINE A. TREFZ ISO
AMAZON'S MOTION TO SEAL - 1
(Case No. 2:23-cv-01495-JHC)

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4. During conferrals on July 18, 2024, August 23, 2024, and September 19, 2024, Plaintiffs indicated that they needed the redacted information in Exhibit O in order to understand Amazon's custodian proposal. They contrasted the information sought with other information they had been able to find through Amazon's disclosures and publicly available information.

5. In correspondence dated October 4, 2024, among others, Plaintiffs requested information about which documents Amazon retained for particular former employees in order to assess Amazon's custodian proposals.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

EXECUTED on this 31st day of December, 2024 in Washington, D.C.

s/ Katherine A. Trefz
Katherine A. Trefz